

POOR LEGIBILITY

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FOSS PLATING COMPANY, INC

REPLY TO
EPA'S CERCLA Follow Up Request
For Information in General Notice Letter Dated
November 7, 2007

Request dated March 13, 2008

March 27, 2008

Presented by
Donald F. Foss
Foss Plating Company
8140 Secura Way
Santa Fe Springs CA 90670

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Summary of Shut Down Activity

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Corrective Action Consent Agreement

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City Permit and Above Ground
Closure Plan

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Final Disposal-Sanitation District
of Los Angeles County

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Closure Activity Log

Section 1

FOSS PLATING COMPANY
8140 SECURA WAY
SANTA FE SPRINGS CA 90670

SUMMARY OF SHUT DOWN ACTIVITY
MARCH 27, 2008

Foss Plating Company was in the metal finishing business at this site from 1968 to October 14, 2005. The company shut down due to loss of business to China.

During late September and October, 2005 we notified the various regulatory agencies of the shut-down. In Mid October, 2005, we met at the Santa Fe Springs Fire Department with several representatives from the three lead agencies for our shut down activity. Five members of management of Foss Plating, met with: Richard Kallman, and others from Santa Fe Springs Health Haz-Mat Division, Irena Edwards from DTSC, and Georgia Blaszcak from Los Angeles County Sanitation District (POTW). Plans were made for safe and legal disposal of all chemicals, process fluids, metals, machinery and equipment, and other above ground clean up with both the city and the sanitation district. Below ground investigation and cleanup is under the direction and over-site of DTSC.

All plans were followed carefully, and was accomplished under the over-site of the above named regulatory agencies.

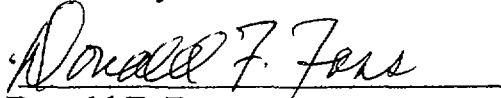
To date, all process fluids were either sold (nickel solutions), shipped offsite by manifest (nickel & chrome solutions) or treated and legally sent to the POTW (rinses, acid and cleaning solutions). The final disposal to the POTW, power wash rinsate, was released to the POTW on March 13-14, 2007. Over-site for the POTW was handed off to Jesse Kerins in 2006


Nickel and copper, as metals, were sold during late 2005. Titanium, more copper and lead were sold during 2006. Also, at least seven roll-off loads of scrap steel were sold during 2006. Five roll-off loads of scrap steel were sold during 2007. Sale of equipment has also continued during the period from 2005 to the present.

In late 2005 two shipments of hazardous waste were sent for disposal, by manifest: 400 gal. nickel solution and 16,600 pounds of liquid chrome solution. During 2006, eight shipments, by manifest were sent: 100 cubic yards of RCRA waste, and 42,000 pounds of nickel bearing solid waste, which was recycled.

The below ground investigation and cleanup, under DTSC, has been very slow. At this date Foss Plating has spent \$84,387 and believes the investigation portion is complete. The current consultants are preparing a revised plan to remove the below ground clarifier, located outside. The Company has estimates of upwards of \$1,000,000 to clean up below ground contamination of nickel and chrome in areas inside the building.

We certify that this report, and all attachments, was prepared under my direction, and is true, accurate and complete to the best of our knowledge and ability.


Donald F. Foss
Director


Carol Foss McCracken
Environmental Manager

Section 2



Department of Toxic Substances Control



Edwin F. Lowry, Director
5796 Corporate Avenue
Cypress, California 90630

John H. Hickox
Agency Secretary
California Environmental
Protection Agency

September 2, 2003

Carol Foss McCracken
Foss Plating Company, Inc.
8140 Secura Way
Santa Fe Springs, California 90670

CORRECTIVE ACTION CONSENT AGREEMENT AND COMMENTS FOR THE
PRELIMINARY ENDANGERMENT ASSESSMENT WORKPLAN DATED MAY 30,
2003 FOR FOSS PLATING FACILITY LOCATED 8140 SECURA WAY, SANTA FE
SPRINGS, CALIFORNIA.

Dear Ms. Foss McCracken:

Enclosed is a Corrective Action Consent Agreement (Consent Agreement) proposed by Department of Toxic Substances Control (DTSC) as the mechanism to facilitate the corrective action process at Foss Plating Company located at 8140 Secura Way, Santa Fe Springs (Facility) and to ensure that your facility is adequately investigated and remediated under DTSC's oversight. Please note that most of the provisions in this Consent Agreement are standard provisions that DTSC uses on a statewide basis. We cannot accept any proposed changes to these provisions without prior approval of our Permitting and Corrective Action Operations Division Chief and DTSC's Office of Legal Counsel. Please limit your comments to the technical issues and the scope of work. If any of your comments result in negotiation requiring significant input from the Permitting and Corrective Action Operations Chief and Office of Legal Counsel, we will have to revise the Estimate of Cost (Attachment 8 to the Consent Agreement) to reflect this additional process.

DTSC reviewed Preliminary Endangerment Assessment Work Plan (Work Plan), dated May 30, 2003, prepared for the Foss Plating Company by Jack's Environmental Technology, Inc. Enclosed are DTSC's comments for the Work Plan and Industrial Hygienist's comments for the Site Health and Safety Plan.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption.
For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.*

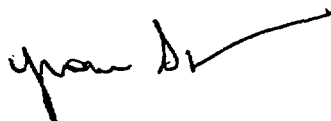
Ms. Carol Foss McCracken

September 2, 2003

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DTSC intends to proceed with corrective action at your facility as soon as possible and would appreciate your prompt response to this letter. Please contact Ms. Irena Edwards at (714) 484-5385 or me at (714) 484-5417 within 10 days of the date of this letter to arrange for a meeting to discuss the Consent Agreement.

Sincerely,



Yvonne Sanchez
Section Chief
State Regulatory Programs Division
Southern California Branch

Enclosure

CERTIFIED MAIL

7002 0860 0000 1657 4954

Return Receipt Requested

cc: Ms. Debra Schwartz
Staff Counsel
Office of Legal Counsel
Department of Toxic Substances Control
1011 N. Grandview Avenue
Glendale, CA 91201

Mr. David Klunk
Santa Fe Springs Fire Department
11300 Greenstone Avenue
Santa Fe Springs, California 90670

STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

IN THE MATTER OF:)	Docket HWCA:
)	SRPD 02/03SCC-1302
)	
Foss Plating Company)	
8140 Secura Way)	
Santa Fe Springs, CA 90670)	
CAD008278236)	CORRECTIVE ACTION
)	CONSENT AGREEMENT
)	
)	Health and Safety Code
Respondent.)	Sections 25187 and 25200.14
)	

INTRODUCTION

1. The Department of Toxic Substances Control (DTSC) and Foss Plating Company (Respondent) enter into this Corrective Action Consent Agreement (Consent Agreement) and agree as follows:

1.1. Jurisdiction exists pursuant to Health and Safety Code section 25187 and 25200.14, which authorize DTSC to issue an order to require corrective action when DTSC determines that there is or may be a release of hazardous waste or hazardous waste constituents into the environment from a hazardous waste facility.

1.2. The parties enter into this Consent Agreement to avoid the expense of litigation and to carry out promptly the corrective action described below.

1.3. Respondent is the the owner and operator of a hazardous waste facility located at 8140 Secura Way, Santa Fe Springs, California (Facility).

1.4. Respondent engages in the management of hazardous waste pursuant to a Conditional Authorization issued by DTSC on August 11, 1993.

1.5. The terms used in this Consent Agreement are as defined in California Code of Regulations, title 22, section 66260.10, except as otherwise provided.

1.6. Respondent agrees to implement all DTSC-approved workplans and to undertake all actions required by the terms and conditions of this Consent Agreement, including any portions of this Consent Agreement incorporated by reference.

1.7. Respondent waives any right to request a hearing on this Consent Agreement pursuant to Health and Safety Code section 25187.

FINDINGS OF FACT

2.1. On December 31, 1996, Respondent submitted a Phase I Environmental Assessment pursuant to Health and Safety Code section 25200.14 (Phase I). The Phase I identified two areas of concern (AOCs) that either have released or may release hazardous waste or hazardous waste constituents into the environment. On August 22, 2002, DTSC conducted a site inspection at the Facility. Based on the site inspection and the information available to DTSC, DTSC has identified solid waste management units (SWMUs) and/or areas of concerns (AOCs) that either have released or may release hazardous waste or hazardous waste constituents into the environment:

- SWMU 1 - Degreaser Operations Area
- SWMU 2 - Wet Floor/Plating Room Area
- SWMU 3 - Underground Clarifier
- SWMU 4 - Wastewater Treatment System.

2.2. Based on the information available to DTSC, DTSC concludes that further investigation is needed to determine the nature and extent of any release of hazardous waste or hazardous waste constituents at the Facility.

2.3. The hazardous waste and hazardous waste constituents of concern at the Facility are heavy metals, chlorinated solvents and machine oil.

2.4. Hazardous wastes or hazardous waste constituents have migrated or may migrate from the Facility into the environment through the following pathways: soil, surface water, groundwater, air, particulate matter.

2.5. The Facility is located in a light industrial/commercial area. Depth to groundwater in the area is reported to be approximately 65 feet below ground surface. The San Gabriel River is reported to be approximately two miles to the west of the Facility. The storm water run-off collection channel is located along the west side of the Facility.

2.6. Releases from the Facility may migrate toward the storm water run-off collection channel, groundwater, and adjacent properties.

PROJECT COORDINATOR

3. Within 14 days of the effective date of this Consent Agreement, DTSC and Respondent shall each designate a Project Coordinator and shall notify each other in writing of the Project Coordinator selected. Each Project Coordinator shall be responsible for overseeing the implementation of this Consent Agreement and for designating a person to act in his/her absence.

All communications between Respondent and DTSC, and all documents, report approvals, and other correspondence concerning the activities performed pursuant to this Consent Agreement shall be directed through the Project Coordinators. Each party may change its Project Coordinator with at least seven days prior written notice.

WORK TO BE PERFORMED

4. Respondent agrees to perform the work required by this Consent Agreement in accordance with the applicable state and federal laws, their implementing regulations, and the applicable DTSC and the United States Environmental Protection Agency guidance documents.

PRELIMINARY ENDANGERMENT ASSESSMENT

5. Respondent shall conduct a Preliminary Endangerment Assessment (PEA) for the entire Facility, and if necessary, further investigation and remediation of any release of hazardous waste or hazardous waste constituents at or from the Facility. Within 30 days of the effective date of this Consent Agreement, Respondent shall submit to DTSC a PEA Workplan and an implementation schedule for approval. Respondent shall implement the DTSC-approved PEA Workplan and schedule. Within 60 days upon completion of the PEA activities, Respondent shall submit to DTSC a Final PEA Report for approval. Respondent shall conduct the PEA in accordance with the Preliminary Endangerment Assessment Guidance Manual (State of California Environmental Protection Agency, Department of Toxic Substances Control, June 1999.)

ADDITIONAL WORK

6. If DTSC determines that further investigation and remediation are necessary at the Facility, DTSC and Respondent will negotiate another consent agreement or amend this Consent Agreement to address the additional work. If another consent agreement or an amendment is not reached within 60 days, DTSC reserves its right to issue an order or take any other action provided for by law. DTSC's costs incurred in negotiating the subsequent consent agreement or the amendment are considered costs incurred pursuant to this Consent Agreement and are payable under this Consent Agreement.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

7. DTSC must comply with the California Environmental Quality Act (CEQA) insofar as activities required by this Consent Agreement are projects subject to CEQA. Respondent shall provide all information necessary to facilitate any CEQA analysis. DTSC will make an initial determination regarding the applicability of CEQA. If the activities are not exempt from CEQA, DTSC will conduct an Initial Study. Based on the results of the Initial

Study, DTSC will determine if a Negative Declaration or an Environmental Impact Report (EIR) should be prepared. DTSC will prepare and process any such Negative Declaration. However, should DTSC determine that an EIR is necessary, such an EIR would be prepared under a separate agreement between DTSC and Respondent.

DTSC APPROVAL

8.1. Respondent shall revise any workplan, report, specification, or schedule in accordance with DTSC's written comments. Respondent shall submit to DTSC any revised documents by the due date specified by DTSC. Revised submittals are subject to DTSC's approval or disapproval.

8.2. Upon receipt of DTSC's written approval, Respondent shall commence work and implement any approved workplan in accordance with the schedule and provisions contained therein.

8.3. Any DTSC-approved workplan, report, specification, or schedule required under this Consent Agreement shall be deemed incorporated into this Consent Agreement.

8.4. Verbal advice, suggestions, or comments given by DTSC representatives will not constitute an official approval or decision.

SUBMITTALS

9.1. Beginning with the first full month following the effective date of this Consent Agreement, Respondent shall provide DTSC with quarterly progress reports of corrective action activities conducted pursuant to this Consent Agreement. Progress reports are due on the first day of the first month following the close of each reporting period. The progress reports shall conform to the Scope of Work for Progress Reports contained in Attachment 1. DTSC may adjust the frequency of progress reporting to be consistent with site-specific activities.

9.2. Any report or other document submitted by Respondent pursuant to this Consent Agreement shall be signed and certified by the project coordinator, a responsible corporate officer, or a duly authorized representative.

9.3. The certification required by paragraph 13.2 above, shall be in the following form:

I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those portions of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared at my direction in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Signature: _____

Name: _____

Title: _____

Date: _____

9.4. Respondent shall provide three copies of all documents, including but not limited to, workplans, reports, and correspondence. Submittals specifically exempted from this copy requirement are all progress reports and correspondence of less than 15 pages, of which one copy is required.

9.5. Unless otherwise specified, all reports, correspondence, approvals, disapprovals, notices, or other submissions relating to this Consent Agreement shall be in writing and shall be sent to the current Project Coordinators.

PROPOSED CONTRACTOR/CONSULTANT

10. All work performed pursuant to this Consent Agreement shall be under the direction and supervision of a professional engineer or registered geologist, registered in California, with expertise in hazardous waste site cleanup. Respondent's contractor or consultant shall have the technical expertise sufficient to fulfill his or her responsibilities. Within 14 days of the effective date of this Consent Agreement, Respondent shall notify DTSC Project Coordinator in writing of the name, title, and qualifications of the professional engineer or registered geologist and of any contractors or consultants and their personnel to be used in carrying out the terms of this Consent Agreement.

QUALITY ASSURANCE

11.1. All sampling and analyses performed by Respondent under this Consent Agreement shall follow applicable DTSC and USEPA guidance for sampling and analysis. Workplans shall contain quality assurance/quality control and chain of custody procedures for all sampling, monitoring, and analytical activities. Any deviations from the approved workplans must be approved by DTSC prior to implementation, must be documented, including reasons for the deviations, and must be reported in the applicable report.

11.2. The names, addresses, and telephone numbers of the California State certified analytical laboratories Respondent proposes to use must be specified in the applicable workplans.

SAMPLING AND DATA/DOCUMENT AVAILABILITY

12.1. Respondent shall submit to DTSC upon request the results of all sampling and/or tests or other data generated by its employees, agents, consultants, or contractors pursuant to

this Consent Agreement.

12.2. Respondent shall notify DTSC in writing at least seven days prior to beginning each separate phase of field work approved under any workplan required by this Consent Agreement. If Respondent believes it must commence emergency field activities without delay, Respondent may seek emergency telephone authorization from DTSC Project Coordinator or, if the Project Coordinator is unavailable, his/her Branch Chief, to commence such activities immediately.

12.3. At the request of DTSC, Respondent shall provide or allow DTSC or its authorized representative to take split or duplicate samples of all samples collected by Respondent pursuant to this Consent Agreement. Similarly, at the request of Respondent, DTSC shall allow Respondent or its authorized representative to take split or duplicate samples of all samples collected by DTSC under this Consent Agreement.

ACCESS

13. Subject to the Facility's security and safety procedures, Respondent agrees to provide DTSC and its representatives access at all reasonable times to the Facility and any off-site property to which access is required for implementation of this Consent Agreement and shall permit such persons to inspect and copy all records, files, photographs, documents, including all sampling and monitoring data, that pertain to work undertaken pursuant to this Consent Agreement and that are within the possession or under the control of Respondent or its contractors or consultants.

RECORD PRESERVATION

14.1. Respondent shall retain, during the pendency of this Consent Agreement and for a minimum of six years after its termination, all data, records, and documents that relate in any way to the performance of this Consent Agreement or to hazardous waste management and/or disposal at the Facility. Respondent shall notify DTSC in writing 90 days prior to the destruction of any such records, and shall provide DTSC with the opportunity to take possession of any such records. Such written notification shall reference the effective date, caption, and docket number of this Consent Agreement and shall be addressed to:

Stephen W. Lavinger, Chief
Tiered Permitting Corrective Action Branch
Permitting and Corrective Action Division
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630

14.2. If Respondent retains or employs any agent, consultant, or contractor for the purpose of carrying out the

terms of this Consent Agreement, Respondent will require any such agents, consultants, or contractors to provide Respondent a copy of all documents produced pursuant to this Consent Agreement.

14.3. All documents pertaining to this Consent Agreement shall be stored in a central location at the Facility, or at a location otherwise agreed to by the parties, to afford easy access by DTSC and its representatives.

DISPUTE RESOLUTION

15.1. The parties agree to use their best efforts to resolve all disputes informally. The parties agree that the procedures contained in this section are the sole administrative procedures for resolving disputes arising under this Consent Agreement. If Respondent fails to follow the procedures contained in this section, it shall have waived its right to further consideration of the disputed issue.

15.2. If Respondent disagrees with any written decision by DTSC pursuant to this Consent Agreement, Respondent's Project Coordinator shall orally notify DTSC's Project Coordinator of the dispute. The Project Coordinators shall attempt to resolve the dispute informally.

15.3. If the Project Coordinators cannot resolve the dispute informally, Respondent may pursue the matter formally by placing its objection in writing. Respondent's written objection must be forwarded to Chief, Tiered Permitting Corrective Action Branch, Hazardous Waste Management Program, Department of Toxic Substances Control, with a copy to DTSC's Project Coordinator. The written objection must be mailed to the Branch Chief within 14 days of Respondent's receipt of DTSC's written decision. Respondent's written objection must set forth the specific points of the dispute and the basis for Respondent's position.

15.4. DTSC and Respondent shall have 14 days from DTSC's receipt of Respondent's written objection to resolve the dispute through formal discussions. This period may be extended by DTSC for good cause. During such period, Respondent may meet or confer with DTSC to discuss the dispute.

15.5. After the formal discussion period, DTSC will provide Respondent with its written decision on the dispute. DTSC's written decision will reflect any agreements reached during the formal discussion period and be signed by the Branch Chief or his/her designee.

15.6. During the pendency of all dispute resolution procedures set forth above, the time periods for completion of work required under this Consent Agreement that are affected by such dispute shall be extended for a period of time not to exceed the actual time taken to resolve the dispute. The existence of a dispute shall not excuse, toll, or suspend any other compliance obligation or deadline required pursuant to this Consent Agreement.

RESERVATION OF RIGHTS

16.1. DTSC reserves all of its statutory and regulatory powers, authorities, rights, and remedies, which may pertain to Respondent's failure to comply with any of the requirements of this Consent Agreement. Respondent reserves all of its statutory and regulatory rights, defenses and remedies, as they may arise under this Consent Agreement. This Consent Agreement shall not be construed as a covenant not to sue, release, waiver, or limitation on any powers, authorities, rights, or remedies, civil or criminal, that DTSC or Respondent may have under any laws, regulations or common law.

16.2. DTSC reserves the right to disapprove of work performed by Respondent pursuant to this Consent Agreement and to request that Respondent perform additional tasks.

16.3. DTSC reserves the right to perform any portion of the work consented to herein or any additional site characterization, feasibility study, and/or remedial actions it deems necessary to protect human health and/or the environment. DTSC may exercise its authority under any applicable state or federal law or regulation to undertake response actions at any time. DTSC reserves its right to seek reimbursement from Respondent for costs incurred by the State of California with respect to such actions. DTSC will notify Respondent in writing as soon as practicable regarding the decision to perform any work described in this section.

16.4. If DTSC determines that activities in compliance or noncompliance with this Consent Agreement have caused or may cause a release of hazardous waste and/or hazardous waste constituents, or a threat to human health and/or the environment, or that Respondent is not capable of undertaking any of the work required, DTSC may order Respondent to stop further implementation of this Consent Agreement for such period of time as DTSC determines may be needed to abate any such release or threat and/or to undertake any action which DTSC determines is necessary to abate such release or threat. The deadlines for any actions required of Respondent under this Consent Agreement affected by the order to stop work shall be extended to take into account DTSC's actions.

16.5. This Consent Agreement is not intended to be nor shall it be construed to be a permit. This Consent Agreement is not a substitute for, and does not preclude DTSC from requiring, any hazardous waste facility permit, post closure permit, closure plan or post closure plan. The parties acknowledge and agree that DTSC's approval of any workplan, plan, and/or specification does not constitute a warranty or representation that the workplans, plans, and/or specifications will achieve the required cleanup or performance standards. Compliance by Respondent with the terms of this Consent Agreement shall not relieve Respondent of its obligations to comply with the Health and Safety Code or any other applicable local, state, or federal law or regulation.

OTHER CLAIMS

17. Except as provided in this Consent Agreement, nothing in this Consent Agreement shall constitute or be construed as a release by DTSC or Respondent from any claim, cause of action, or demand in law or equity against any person, firm, partnership, or corporation for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous constituents, hazardous substances, hazardous wastes, pollutants, or contaminants found at, taken to, or taken or migrating from the Facility.

COMPLIANCE WITH WASTE DISCHARGE REQUIREMENTS

18. Respondent shall comply with all applicable waste discharge requirements issued by the State Water Resources Control Board or a California regional water quality control board.

OTHER APPLICABLE LAWS

19. All actions required by this Consent Agreement shall be conducted in accordance with the requirements of all local, state, and federal laws and regulations. Respondent shall obtain or cause its representatives to obtain all permits and approvals necessary under such laws and regulations.

REIMBURSEMENT OF DTSC'S COSTS

20.1. Respondent shall pay DTSC's costs incurred in the implementation of this Consent Agreement.

20.2. An estimate of DTSC's costs is attached as Exhibit A showing the amount of \$11,653. It is understood by the parties that this amount is only a cost estimate for the activities shown on Exhibit A and it may differ from the actual costs incurred by DTSC in overseeing these activities or in implementing this Consent Agreement. DTSC will provide additional cost estimates to Respondent as the work progresses under the Consent Agreement.

20.3. Respondent shall make an advance payment to DTSC in the amount of \$ 5,826.50 within 30 days of the effective date of this Consent Agreement. If the advance payment exceeds DTSC's costs, DTSC will refund the balance within 120 days after the execution of the Acknowledgment of Satisfaction pursuant to Section 22 of this Consent Agreement.

20.4. DTSC will provide Respondent with a billing statement at least quarterly, which will include the name(s) of the employee(s), identification of the activities, the amount of time spent on each activity, and the hourly rate charged. If Respondent does not pay an invoice within 60 days of the date of the billing statement, the amount is subject to interest as provided by Health and Safety Code section 25360.1.

20.5. DTSC will retain all costs records associated with the work performed under this Consent Agreement as required by state law. DTSC will make all documents that support the DTSC's cost determination available for inspection upon request, as provided by the Public Records Act.

20.6. Any dispute concerning DTSC's costs incurred pursuant to this Consent Agreement is subject to the Dispute Resolution provision of this Consent Agreement and the dispute resolution procedures as established pursuant to Health and Safety Code section 25269.2. DTSC reserves its right to recover unpaid costs under applicable state and federal laws.

20.7. All payments shall be made within 30 days of the date of the billing statement by check payable to the Department of Toxic Substances Control and shall be sent to:

Accounting Unit
Department of Toxic Substances Control
P. O. Box 806
Sacramento, California 95812-0806

All checks shall reference the name of the Facility, the Respondent's name and address, and the docket number of this Consent Agreement. Copies of all checks and letters transmitting such checks shall be sent simultaneously to DTSC's Project Coordinator.

MODIFICATION

21.1. This Consent Agreement may be modified by mutual agreement of the parties. Any agreed modification shall be in writing, shall be signed by both parties, shall have as its effective date the date on which it is signed by all the parties, and shall be deemed incorporated into this Consent Agreement.

21.2. Any requests for revision of an approved workplan requirement must be in writing. Such requests must be timely and provide justification for any proposed workplan revision. DTSC has no obligation to approve such requests, but if it does so, such approval will be in writing and signed by the Chief, Tiered Permitting Corrective Action Branch, Hazardous Waste Management Program, Department of Toxic Substances Control, or his or her designee. Any approved workplan revision shall be incorporated by reference into this Consent Agreement.

TERMINATION AND SATISFACTION

22. The provisions of this Consent Agreement shall be deemed satisfied upon the execution by both parties of an Acknowledgment of Satisfaction (Acknowledgment). DTSC will prepare the Acknowledgment for Respondent's signature. The Acknowledgment will specify that Respondent has demonstrated to the satisfaction of DTSC that the terms of this Consent Agreement including payment of DTSC's costs have been satisfactorily

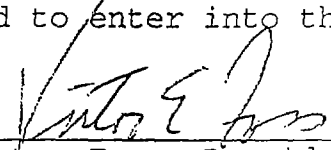
completed. The Acknowledgment will affirm Respondent's continuing obligation to preserve all records after the rest of the Consent Agreement is satisfactorily completed.

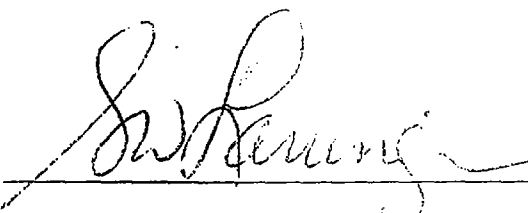
EFFECTIVE DATE

23. The effective date of this Consent Agreement shall be the date on which this Consent Agreement is signed by all the parties. Except as otherwise specified, "days" means calendar days.

SIGNATORIES

24. Each undersigned representative certifies that he or she is fully authorized to enter into this Consent Agreement.

DATE: 9/24/03 BY: 
Victor Foss, President
Foss Plating Company/ Respondent

DATE: 9/25/03 BY: 
Stephen W. Lavinger, Chief
Tiered Permitting, Corrective Action Branch
Permitting and Corrective Action Division
Department of Toxic Substances Control

ATTACHMENT 1

SCOPE OF WORK FOR PROGRESS REPORTS

Progress reports shall include:

1. All actions taken during the reporting period to achieve compliance with the order;
2. A summary of any findings made during the reporting period;
3. All problems or potential problems encountered during the reporting period (also discuss problem solutions);
4. All projected work for the next reporting period as well as anticipated problems and avoidance measures;
5. A discussion of any changes in personnel that occurred during the reporting period;
6. Summaries of all contacts with representatives of the press, local community, or public interest groups; and
7. Results of any sampling, tests, of other data generated during the Facility Investigaiton.

EXHIBIT A

COST ESTIMATE WORKSHEET CORRECTIVE ACTION CONSENT AGREEMENT

Foss Plating Company

PROGRAMS	Class Code	Class Name	Facility Investigaiton			PEA	Health & Safety Plan	Total Hours	Rate (\$/hr)	Cost
			Workplan	Implementation	Report					
SRPD	3564	HSS	4	8	8	8	2	30	\$110	\$3,300
	3566	SHSSI	1	1	1	1		4	\$126	\$504
	3565	SHSSII						0	\$146	\$0
	1181	WPT	1		1			2	\$57	\$114
Public Participation	5373	PPSpecialist						0	\$103	\$0
	5372	PPSupervisor						0	\$118	\$0
Toxicologist	7978	Staff Toxicologist			8	16		24	\$149	\$3,576
	7942	Senior Toxicologist				1		1	\$156	\$156
Hydro/Geologist	3728	HSEG	4	8	8			20	\$116	\$2,320
	3730	SHSEGI	1	1	1			3	\$134	\$402
	3729	SHSEGII						0	\$147	\$0
Industrial Hygienist	3852	Associate IH	1	1			8	10	\$115	\$1,150
	4567	Senior IH					1	1	\$131	\$131
Total			12	19	27		11	95	TOTAL =	\$11,653

Preliminary Endangerment Assessment (PEA)

+ Community Profile: Review/comment of Community Profile data and report

+ Hourly Rates are DTSC Contract Estimation Rates effective 7/01/01 - 6/30/02. (Hourly Rate + Indirect @ 191.68%)

+ Class Name: Listed are the most commonly used Class Names

* Note: This worksheet does not include Cost Estimate for Interim Measures (IM), Facility Investigation (FI), Corrective Measure Study (CMS), Corrective Measure Implementation (CMI), or any other additional work not calculated in the above table.

Department of Toxic Substances Control Comments for the Preliminary Endangerment Assessment Work Plan For Foss Plating Company

Specific Comments:

Specific Comment 1

Facility background Information must include:

- Land use within ¼ mile that might influence onsite conditions.

- Regulatory agencies' records review.

- Summary of prior assessments and investigations conducted at the facility.

- Site visual inspection notes by the contractor preparing the PEA.

Specific Comment 2

Assessment of Background Levels (2.1, page 5)

Workplan proposes only one background soil sample collection location in the polishing shop.

DTSC recommends Foss Plating collect background soil samples from at least 4 boring locations at depths of 1, 5, 10 feet bgs. Office area and parking lot, behind the building would be suitable locations for background soil sampling.

Specific Comment 4

Characterization (2.3, page 6), Summary Table (page 9), Workplan states: In consultation with DTSC staff, the 5 and 10 feet samples would be analyzed for VOC's by EPA method 8260B. Based on DTSC review of the *Characterization* and the *Sampling Plan*, soil matrix samples will be collected for VOC USEPA 8260B.

During the teleconference with Ms. Foss-McCracken, DSTC staff recommended Foss Plating to conduct a soil gas survey at five and ten feet below ground surface.

Specific Comment 5

The Workplan states: Soil samples from 15 feet would only be analyzed if the 15 foot sample or adjacent lateral samples had significantly elevated VOCs.

Workplan does not specify laboratory turn around time and procedures to ensure holding times will not be jeopardized.

This may be a problem. As you know, Encore holding time is 48 hours. Soil samples preserved in the methanol must be analyzed within 14 days. DTSC cannot concur with the proposed procedure. Instead DTSC recommends Foss

Plating conduct a rapid site characterization utilizing soil gas collection and analysis by an on-site mobile laboratory. For vertical characterization a deeper soil gas probe may be installed at the location with the highest detected VOCs' concentrations in soil gas.

Specific Comment 6

Sampling Plan

DTSC recommends Foss Plating adjust the sampling plan based on the site background information. DTSC recommends soil gas samples in the waste water treatment area, clarifier area, shipping/receiving area, hazardous waste storage, surface storm channel.

Specific Comment 7

DTSC recommends installing three continuous borings to assess site lithology every two feet. Project geologist must include notes describing soil classification, color changes, moisture, order, and PID readings in the boring logs. Boring logs must be signed by a registered California geologist.

Specific Comment 8

Workplan must include provisions for adjusting soil samples' depths based on field observations.



Department of Toxic Substances Control



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Edwin F. Lowry, Director
1011 N. Grandview Avenue
Glendale, California 91201

Gray Davis
Governor

MEMORANDUM

TO: Irena Edwards
Hazardous Substances Scientist
State Regulatory Program
5796 Corporate Avenue
Cypress, CA 90630

FROM: Shahrzad Nouri, M.S. *SN*
Human and Ecological Risk Division
Industrial Hygiene & Safety Branch (IHSB)
1011 North Grandview Avenue
Glendale, CA 91201

DATE July 25, 2003

SUBJECT: FOSS PLATING COMPANY
Santa Fe Springs, California
PCA: 36507

BACKGROUND:

The State Regulatory Program in Cypress, requested on June 20, 2003 that the Industrial Hygiene and Safety Branch (IHSB) review and comment on the health and safety plan (HASP) for the Foss Plating Company. The Foss Plating Company is located at 8140 Secura Way, in the City of Santa Fe Springs, California.

The Site is situated on the east side of Secura Way, north of the intersection of Secura Way and Rivera Road, approximately 3.9 miles Northeast of Santa Fe Springs City Hall.

Foss plating has been in operation at their present location since 1968. An inspection of records of the Santa Fe Springs Building Department failed to give any indication of prior occupants. Foss Plating Company conducts metal plating of various metal components. There are two plating lines and one stripping line contained within the plating building. Use of chemicals has included corrosives, nickel and chrome, small concentrations of cyanide and arsenic, and chlorinated solvents.

The scope of work is to conduct sampling in accordance with the Work Plan dated May, 2003.

GENERAL COMMENTS:

The Department of Toxic Substances Control (DTSC) has reviewed the health and safety plan for compliance with Title 8, California Code of Regulations (T8 CCR), Department of Toxic Substances Control policies and procedures, and the NIOSH/OSHA/USCG/EPA Guidance Manual as well as other appropriate State and Federal Health and Safety Regulations. Implementation is the employer's responsibility therefore, the review of the health and safety plan is not a guarantee that it will be properly and safely implemented. All sub-contractors must submit their own health and safety plans to DTSC for review.

DOCUMENT REVIEWED:

The IHSB reviewed the "Foss Plating Company Health and Safety Plan" located in the city of Santa Fe Springs, California on July 25, 2003. Jack's Environmental Technology, Inc. prepared the plan.

SPECIFIC COMMENTS:

1. Section 3.0 Site Description. The plan states, "Conduct sampling in accordance with the Work Plan dated May, 2003." Please describe in detail the activities to be conducted at the Site and incorporate this into the HASP. Please discuss the duration for the proposed activities.
2. Section 5.0 Hazards. The PEL for perchloroethylene is 25 ppm. The PEL for trichloroethylene is 25 ppm. The PEL for trichloroethane is 350 ppm. Please make these changes.
3. Section 5.0 Hazards. Please provide action levels incorporating all of the potential chemicals found on Site. Please provide greater detail describing air monitoring action levels, which will be utilized on site. The description of these action levels must include a summary of how they were derived. The action levels must incorporate the response factor of the monitoring instrument of choice. The specific type of monitoring instrument must also be incorporated. Additionally, action levels must also be provided for upgrade to Level C and Level B using all of the chemicals listed. The location(s) and minimum monitoring frequency of measurements must also be provided.
4. Section 5.0 Hazards. Please refer to permeation/penetration charts when deciding the correct PPE to utilize. Please describe the level of protection as well as the type of PPE in detail needed for each specific task(s). Please specify the type of coveralls and the corresponding tasks which will require their utilization. Depending on the work task, coveralls will not prevent the absorption of chemicals through the skin.

5. Section 5.0 Hazards. Please specify in detail when and for what activity a respirator will be needed. It is important to note that the use of an air purifying respirator (APR) for protection against gases and vapors requires the use of an APR cartridge equipped with an end of service life indicator, or, the calculation of a change-out schedule incorporating site and user-specific criteria (i.e., respiration volume, relative humidity, contaminant concentration, etc.)
6. Section 5.0 Hazards. Section 1.3 Operations, lists some chemicals that are not discussed in Section 5.0 Hazards. Please provide action levels incorporating all of the potential chemicals found on Site.
7. Section 5.0 Hazards. Cyanide is one of the chemicals listed in this section and cannot be detected by a PID. It is recommended that monitoring for cyanide with an instrument such as a PAC III single gas detector or an equivalent be conducted.
8. Section 5.0 Hazards. The plan states, "Draeger tubes detect nickel concentrations as low as .1 mg/m³, and the TLV is 1.5 mg/m³." TLVs are guidelines whereas the PELs are the levels that are regulated by Cal-OSHA. Consequently, the PELs are the levels that should be followed. Please clarify whether nickel carbonyl or nickel in its metallic form is found on site and incorporate the correct PEL into the HASP.
9. Section 5.0 Hazards. Since metals are an issue, the IHSB recommends that real-time particulate monitoring be conducted during field activities. Please state in detail, what instrument you will use and the action level(s) set for upgrade to Level C. Please state the action level in which all work will be stopped.
10. Section 5.0 Hazards Please specify the lamp strength in (eV) of the PID which will be employed on Site
11. Section 5.0 Hazards. Cal OSHA does not allow reliance upon subjective methods to demonstrate compliance with the Hearing Conservation Program. Drilling can cause noise levels to exceed 100 decibels. Therefore, noise monitoring should be conducted to verify that the selected hearing protection devices are adequately protective. Please describe noise-monitoring protocols to be employed on site, including a description of the instrumentation, frequency of monitoring, and corresponding action levels. This plan should be developed in accordance with Title 8 of the California Code of Regulations. (8 CCR 5095-5100)
12. Section 5.0 Hazards. In order to maintain an environment free from heat stress hazards, heat stress monitoring should be conducted. The initiation of heat stress monitoring should be required when employees are working in

July 25, 2003

Page 4

environments exceeding 70 degrees F ambient air temperature. The development of heat-related disorders can be prevented via observation of and communication with site workers from the beginning of the work period. Please provide a detailed work/rest schedule.

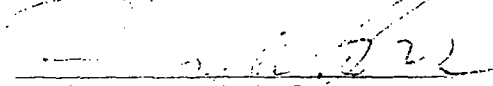
CONCLUSION:

The site HASP is intended to be a document that will allow the on-site workers to become familiarized with the site(s) history, known or potential health hazards, proposed work activities, emergency action plans, and the site safety information that is necessary to mitigate the risks from the identified hazards. The site HASP must be able to provide field staff with sufficient information to compile an accurate assessment of the site safety issues associated with every job function.

The HASP is well written and contains valuable information. However, the submitted document requires additional information and/or clarification of the issues identified above. Areas where the IHSB has requested additional information and/or clarification must be corrected or clarified.

Future changes in the document should be clearly identified. This may be accomplished in several ways: by submitting revised pages with the reason for the changes noted, by the strikeout and underline method, by the use of shading or italics, or by a cover letter stating how each of the comments herein have been addressed. Final revisions must be incorporated into the document in a comprehensive format, which allows site workers to readily access information within the documents. If questions should arise, please contact Shahrzad Nouri at (818) 551-2889.

Peer Review:


Frank Parr, CIH, CSP
Senior Industrial Hygienist

CC: HERD
Site File



Alan C. Lloyd, Ph.D.
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

October 5, 2005

Ms. Carol Foss McCracken
Foss Plating Company, Inc.
8140 Secura Way
Santa Fe Springs, California 90670

CORRECTIVE ACTION CONSENT AGREEMENT FOR FOSS PLATING FACILITY LOCATED AT 8140 SECURA WAY, SANTA FE SPRINGS, CALIFORNIA

Dear Miss Foss McCracken:

This letter is a follow-up regarding our meeting with Foss Plating Company owners at the Santa Fe Springs Fire Department. During the meeting we discussed your plans to terminate plating activities at the site on or around October 1, 2005. You requested to postpone all soil and groundwater investigation activities inside the Plating Room until after Foss Plating completes the closure of the Tiered Permitted Waste Water Treatment system. Santa Fe Springs Fire Department will oversee the removal of the above ground tanks, sumps, and associated piping. DTSC will oversee all soil and groundwater sampling when the removal of the above ground tanks, sumps, and associated piping is complete. Foss Plating did not propose a firm closure schedule or completion date.

In order to comply with the terms and conditions of Corrective Action Consent Agreement (Consent Agreement) that was issued to Foss Plating Company by the Department of Toxic Substances Control (DTSC) on September 25, 2003, Foss Plating Company shall provide DTSC with quarterly progress reports. Please submit the first progress report to DTSC on or before December 1, 2005. The report must provide closure completion date, a revised schedule for soil and groundwater investigation, and revised soil sampling plan. The revised soil sampling plan must include soil samples in the wastewater treatment area. The report must also include the name, address, and telephone number of the new consultant.

trenches

2 inside

piping

Ms. Carol Foss McCracken
October 5, 2005
Page 2

If you have any questions regarding this matter, please contact me at (714) 484-5385.

Sincerely,



Irena Edwards
Hazardous Substances Scientist
Tiered Permitting Corrective Action Branch

cc: Mr. Richard Kallman
Santa Fe Springs Fire Department
11300 Greenstone Avenue
Santa Fe Springs, California 90670

Mr. James Grace
Staff Counsel
Office of Legal Counsel
Department of Toxic Substances Control
1001 I Street/P.O. Box 806
Sacramento, California 95812-0806

CERTIFIED MAIL
7003 1680 0000 7361 5135
Return Receipt Requested

Section 3

PLAN REVIEW / PERMIT APPLICATION

Closure Plan for Pletting Operation area

Signature _____ Date / /

Kallman 10-18-05
INSPECTOR DATE
MAKE CHECKS PAYABLE TO THE CITY OF SANTA FE SPRINGS

329.00

173, 174, 175, 176

City of Santa Fe Springs Fire Department
11300 GREENSTONE AVE • SANTA FE SPRINGS • CA 90670
(562) 944-9713 • FAX (562) 941-1817

PLAN REVIEW / PERMIT APPLICATION

Name of Facility Foss Plating
Project Address 8140 Secura Way
Project Contact Carol McCracken Telephone (562) 945-3451
Architect/Engineer _____ Telephone () _____
Address _____

Description of work <u>Closure Plan for Plating Operation Area</u>

CONTRACTOR INFORMATION (if applicable)

Contractor _____ Telephone () _____
Address _____
License Class _____ License Number _____ Expiration Date ____/____/____

LICENSED CONTRACTOR DECLARATION (if applicable)

I hereby affirm that I am licensed under provisions of Chapter 9 (commencing with section 7000) of Division 3 of the Business and Professions Code, and my license is in full force and effect.

Signature _____ Date ____/____/____

OWNER/BUILDER DECLARATION

I hereby certify that I have read this application and state that the above information is correct. I agree to comply with all city ordinances and state laws relating to construction, and hereby authorize representatives of this city to enter upon mentioned property for inspection purposes.

Signature _____ Date ____/____/____

√	FIRE PROTECTION DIVISION	FEE	√	ENVIRONMENTAL PROTECTION DIVISION	FEE
	Preliminary Plan Review			Preliminary Plan Review (Article 80)	
	3 or more Plan Re-Submittal			"H" Occupancy	
	Fire Alarm System			Emergency Alarm System	
	Fire Extinguishing System (Dry Chem System)		✓	Closure Plan/Permit Review	\$ 320
	Fire Sprinkler Systems sq. ft. per floor			UST & AST (Installation/Removal/Modifications)	
	New Construction Plan Review			a. First Tank	
				b. Each Additional Tank	

Occupancy Rating
2W

City
of
Santa Fe Springs

DISTRIBUTION					
FUND	G/L	ACTIVITY	OBJECT	PROJECT	AMOUNT
110	347	3260	A-HSM		320-

Foss Plating
(NAME)

(ADDRESS)

(CITY AND STATE)

Closure plan
(DESCRIPTION)

RECEIPT

ck# 67480

Item Expense				
Other				
TOTAL DUE				\$ 320

Kallman

INSPECTOR

10-18-05

DATE

1018..12

320.00

MAKE CHECKS PAYABLE TO THE CITY OF SANTA FE SPRINGS

FOSS PLATING COMPANY, INC
8140 SECURA WAY
SANTA FE SPRINGS, CA 90670

ABOVE GROUND CLOSURE PLAN
October 19, 2005

PREPARATION: August through early October, 2005

1. Notify, verbally and/or in writing
 - Employees
 - Customers
 - DTSC, CUPA, and other regulators
 - Selected suppliers
2. Transition period
 - Give all assistance to existing customers in finding new vendors
 - Help employees with out placement
 - Plating operations to continue until Oct 1, and further for customer needs and to use up chemicals
 - **Careful planning for chemical purchases to use up all incoming chemicals sometime in early October.** Unused nickel is to be sold.
 - Follow procedures outlined in the existing Closure Plan for Wastewater Treatment. That is: sell or give away what we can. Start arrangements for recycling of all other metals. Then, do as much closure activity as possible using our trained staff. We know our equipment and we understand the properties of the hazardous materials on hand.
3. Preliminary meeting with Santa Fe Springs, CUPA, DTSC and LA County Sanitation to coordinate cleanup efforts to everyone's satisfaction.
4. Closure will take place during several stages which will address concerns from Santa Fe Springs CUPA, DTSC and LA County Sanitation. Each section will be covered by a different plan.
 - Inside above ground closure (City, County Sanitation)
 - Further investigation, below ground (DTSC)
 - Removal of trenches, sumps, inside (City)
 - Above and below ground removal of wastewater treatment (City, LA County Sanitation)
 - Clearing the polishing building so it can be sold/leased
 - Ground Remediation (DTSC)
 - Lease or sale of the property
5. Preliminary go-ahead to try to close the polishing building first was given by DTSC. This is to be pursued as a separate stage.

6. Foss Plating interviewed and received bids from three consultant firms; RRD Environmental Services, Jeff Nighswonger Construction and Jack's Environmental
7. After plating operations cease, and while official closure plans are being written and approved, Foss Plating plans to sell as much used equipment as possible. Scrap steel will be sold for recycling. Foss Plating will proceed with treatment of all rinses, acids and cleaners, under existing permits. Foss Plating will arrange for off-site disposal of nickel and chrome plating baths.
8. Below ground closure will have DTSC as Lead Agency. After choosing a consultant, a below ground closure plan will be written and submitted to DTSC. Copies will be submitted to the City of Santa Fe Springs, and Sanitation District of LA County.

CLEANUP PROCEEDURE-ABOVE GROUND

1. Complete the application for the Above Ground Closure Plan and submit to the City of Santa Fe Springs.
2. Before, during and after writing this plan, discuss all aspects with the city and with the entire management team.
3. Clarify city requirements regarding how much outside oversight will be required. Arrange for this oversight. Clarify when an outside consultant will be required.
4. Interview hazardous waste haulers used in the past, recommended, or as bid. At the appropriate time, arrange for roll-off bins to be delivered. Clarify what can be disposed of as RCRA, or non-RCRA waste, and what can be put in the regular trash.
5. During the entire above ground cleanup, all stages will be fully documented by Environmental Manager, Carol McCracken and Edward Foss, Project Manager. At appropriate times, licensed consultants will certify disposal.

ELEMENTS FOR ABOVE GROUND CLOSURE

1. Asbestos Contamination. None is expected. Discontinued use of any asbestos products over fifteen years ago.
2. Various 55 gallon drums and other sized storage containers. All empty 55 gal drums suitable for liquids will be kept to move the nickel and chrome solutions. Other large containers, poly, steel or cardboard, will be sold/given away, or converted to trash and material containers. At final disposal, they will be washed, cut or crushed and disposed of in the regular trash. Rinseate will go through our wastewater treatment system.

BASIC RULE: If it held or touched hazardous materials it must be washed before disposal. Drums may be reused as containers or for trash. Drums also may be sold or given away.

- If otherwise clean, and not impregnated with hazardous material it may be triple washed and sent to the regular trash.
 - If impregnated, dispose of as RCRA Waste.
 - If it did not hold or touch hazardous materials, a simple rinse may or may not be needed before disposal in regular trash.
3. **Above ground tanks.** We will attempt to sell above ground process tanks. Metals (steel, nickel, copper) not sold for reuse will be sold as scrap. All tank liners not sold must be disposed of as RCRA waste.
 4. **Below ground tanks, trenches and sumps.** For this portion of closure, all inside below ground tanks, trenches and sumps will be cleaned out, washed, and will be dry. They will be further cared for after the building is cleared out, following separate plans under the oversight of the City of Santa Fe Springs.
 5. **High Pressure Cylinders:** After plating operations stop, the compressor will be sold or given away for parts. Welding tanks are no longer on site. Any welding equipment brought on site for cleanup will be returned.
 6. **Process Lines and Vessels:** We are trying to sell the plating line and hoists. All items not sold or given away will be power washed and sold for scrap (metals) or disposed of as RCRA waste.
 7. **Pipelines:** A few pipelines are in the trenches and carried hazardous waste. These will be dismantled, power washed and disposed of as RCRA or non RCRA waste. Other pipe lines are above ground. Most above ground plastic pipe only carried city water or air. These will be washed and disposed of in regular trash. Wastewater treatment technician Abel Sanchez will help identify the above ground plastic pipes that ever held anything hazardous, paying special attention to all pipes in the nickel area. Above ground pipes that ever held anything hazardous will be triple washed and disposed of as a RCRA or non-RCRA waste.
 8. **LPG Tanks:** The forklift runs on LPG. A storage tank is located at 8143 Secura. The forklift will be sold after all cleanup is finished. The storage tank will be returned to the supplier.
 9. **Hazardous Waste:** The wastewater treatment system will continue to dispose of process rinses, acid and cleaner solutions. It will also process rinseate from Power Wash activity. F006, or plating waste will be generated. All F006 will be shipped offsite, by manifest, for recycling. Metals that held hazardous waste will be triple washed, inspected, and sold for scrap. Poly tanks, piping, etc that held hazardous waste will be triple washed and disposed of as RCRA or non RCRA waste.
 10. **Rinseate from power wash:** All rinseate from power wash activity will be held and sampled both before and after treatment. Results are to be sent to Sanitation District

(Georgia) before disposal through the wastewater treatment system.

10. Plating solutions, nickel and chrome: Plating solutions will be sold, given away or shipped by manifest for recycling or disposal.
11. Other hazardous waste: Floor racks, cement block and cement from berms, and other debris will be disposed of as RCRA or non RCRA waste. Non-RCRA waste will be triple washed. RCRA waste will be cleaned up to meet the requirements of our licensed hauler.
12. Universal Waste: Florescent light bulbs, used oil, batteries and other universal waste will be sent for proper disposal.
13. Industrial Wastewater Pretreatment Equipment: The wastewater treatment system will remain in operation for above ground cleanup. The area contains both above and below ground equipment. Specific procedures will be similar, and will be covered under future plans.
14. Sumps, trenches and clarifiers: Disposal of this equipment will also be detailed in future closure plan.
15. Wells, oil or water: We have none.
16. Other waste residue on floors and ground: When the above ground cleanup is complete, the floors will be swept and washed. Whatever is swept up will be placed in the hazardous waste bin for disposal as RCRA waste.
17. Soil and Groundwater contamination: Previous testing showed the presence of detectable amounts of chrome, nickel and VOCs. Below ground further investigation and closure will be detailed in future plans to be given to DTSC. When written, a copy will be submitted to the City of Santa Fe Springs.
18. Safety and Training: Staff responsible for closure are all long-time and experienced workers. They have already had extensive in-house training. Closure activity will require different activity. Further training and review of:
 - Read and understand the finished Closure Plan
 - Review of Hazardous Waste Management
 - Review of Personal Protective Equipment, including fit
 - General review of basic industrial safety, with video (Spanish/English)
 - Review of forklift safety, with video (Spanish/English)
 - Review Confined Space Procedures
 - Send at lease one person to Metal Finishing Seminar on Hazardous Waste, etc., on Wednesday, Oct 19.
18. Provide and require appropriate personal protective equipment, such as:
 - Safety goggles

- Steel toe footwear, steel toe rubber boots
- Hard hats
- Gloves
- Hearing protection and respiratory protection when needed

[Yahoo!](#) [My Yahoo!](#) [Mail](#)[Search
the Web](#)[Search](#)**YAHOO! MAIL**Welcome, **mccracken_carol**
[[Sign Out](#), [My Account](#)][Mail Home](#) - [Mail Tutorials](#) - [Help](#)**Mail Plus** ▾**Addresses** ▾**Calendar** ▾**Notepad** ▾**What's New - Upgrades - Options****Check Mail****Compose****Search Mail****Search the Web****Folders**

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Delete**Reply** ▾**Forward** ▾**Spam****Move...** ▾This message is not flagged. [[Flag Message](#) - [Mark as Unread](#)]**Subject:** RE: Closure Letter**Date:** Mon, 3 Oct 2005 07:09:16 -0700**From:** "Richard A. Kallman" <richardkallman@santafesprings.org> [Add to Address Book](#) [Add Mobile Alert](#)**To:** "Carol McCracken" <mccracken_carol@yahoo.com>**Search Shortcuts**[My Photos](#)[My Attachments](#)

Equipment is equipment and is not a waste. As long as the cl
willing to take it and you are comfortable that it is clean e
that it will not endanger anyone (liability issues for you),
for
it. Keep receipts to show that you have legally gotten rid o
equipment and not sent to the trash. No inspection by us req

RAK

-----Original Message-----

From: Carol McCracken [mailto:mccracken_carol@yahoo.com]

Sent: Friday, September 30, 2005 7:08 AM

To: Richard A. Kallman

Subject: Re: Closure Letter

--- "Richard A. Kallman"

<richardkallman@santafesprings.org> wrote:

Richard,

Thanks for the closure letter. I was a little
slow checking my e-mail. Foss Plating is interviewing
consultants and possible equipment buyers. I will
have a draft Closure Plan sometime next week and will
call before bringing it over for review.

We have questions.

How clean does equipment need to be if we are selling
it. A simple rinse and dry? Power wash? Inspection?
I assume we need to keep bills of sale, etc.

> Carol McCracken

> Foss Plating Co

>

>

> Here is a generic copy of our closure letter.

>

Section 4

Final Disposal

Treated Wastewater

Sanitation Districts of Los Angeles County

March 13-14, 2007

Laboratory Technical Data System
SJC WQL Test Results

04/05/2007
Page 1

Sample No: SJ83947 Sample Location: 3-IW04-352
Requestor: MARTYN Completion Date: 04/04/2007
Charge No: IW14905BM00 Approved By: MP Sample Type: IWS
Composite Date and Time - From: 03/13/2007 09:25 To: 03/14/2007 09:45
Sample Description:
FOSS PLATING CO INC, 8140 SECURA WAY, SFS (SBX)

No. Test	Description	Result	Unit of Measure	Footnote
1. 151	SUSPENDED SOLIDS	20	MG/L	--
2. 403	TOTAL COD	142	MG/L O	--
3. 708	CADMIUM	< 0.020	MG/L CD	--
4. 709	TOTAL CHROMIUM	1.13	MG/L CR	--
5. 712	COPPER	0.24	MG/L CU	--
6. 714	LEAD	0.11	MG/L PB	--
7. 718	NICKEL	1.46	MG/L NI	--
8. 722	SILVER	< 0.05	MG/L AG	--
9. 724	ZINC	0.21	MG/L ZN	--

Section 5

**FOSS PLATING COMPANY
CLOSURE ACTIVITY LOG**

October 14, 2005 – Last day plating

WEEK OF OCT 17-21, 2005

1. Pulled all nickel metal from anode bags. Washed and weighted
2. Oct 18: Sent by manifest 24644008 polishing dust and debris to US Ecology by way of Worldwide Recovery.
3. 10/19 Sold remaining chemicals, including partial bags/drums to Cal Tron
4. 10/19 Sold 1760 pounds nickel metal to RRD Environmental Services
5. 10/20 Sold major lab equipment to Pacific Plating Supply
6. Continued collecting nickel balls, kept in separate container for future sale
7. 10/20 Visit by [REDACTED] SFS CUPA No problems noted
8. Disconnected all rectifiers and amp meters. Moved to separate areas, and began to clean and dust.

WEEK OF OCT 24-28, 2005

1. Continued cleaning, dusting all rectifiers and amp meters for possible sale
2. Began disconnecting all filters. Moved for cleaning, possible sale
3. Assembled all racks in one area
4. Began disassembling all cat-walks. Separate wood (RCRA), and cut up steel for disposal as scrap.
5. Began removing all plastic piping. Separate and outside wash all pipe used only for city water or air. If clean, these pipes were sent to regular trash
6. Kept plastic piping used for nickel, other chemicals
7. Began separating all scrap steel, copper wire, nickel balls, RCRA waste
8. Began sweeping up, area by area (as RCRA waste)
9. Started collecting copper bus bars

WEEK OF OCT 31-NOV 4, 2005

1. Further work collecting copper bus bars. Cleaned and separated by size
2. Further work separating copper wire, nickel balls, scrap steel, RCRA waste
3. Further work disassembling cat-walks.
4. Sold some scrap steel to [REDACTED] (Williams Recycling)
FOIA ex 6, Personal Privacy
5. Further sweeping, inside and out (inside as RCRA waste)

WEEK OF NOV 7-11, 2005

1. Finished removing and cleaning the rest of the copper bars
 2. 11-9 Sold 1600# #1 grade copper to Shreeji Plating & Coating
 3. 11-9 Inspection by [REDACTED], Sanitation Districts of LA County. No problems noted
Discussed plans to collect and test power wash rinsate.
 4. Cleaned lab. [REDACTED] determined that small samples of treated chrome and sodium hydroxide (slight pH adjustment needed today) could go directly to
- Week of Nov 7-11, 2005 cont.

5. wastewater treatment. Other substances were set aside in the lab for further determination.
6. Began cleaning, trimming lead anodes for sale
7. Further sweeping, inside and out (inside as RCRA waste)

WEEK OF NOV 14-18, 2005

1. Purchase power washer
2. Moved rectifiers to warehouse
3. Arrange for nickel solutions to be shipped off site for recycling
4. Pump part of nickel solution into totes, to be shipped off site for recycling
5. Nov 16: Shipped out 3 totes of nickel plating solution, for reuse. Sent by North State Environmental to Impressions Polishing and Plating.
Three other totes were rejected as leakers. Leaks became apparent when moving totes by forklift.
6. Nov 16; Sold 476 lbs copper bus bar to Shreeji Plating Co
7. Nov 17: Phibro Tech picked up remaining nickel solution, including pumping out the three totes that had a slow leak. See manifest 24758157
8. Nov 18: Began Power Wash operations, starting with filters. Set up so it drains to a below ground tank. Rinsate to be tested before treatment
9. Finished cleaning, trimming lead anodes, for sale
10. Continued sweeping, inside and out (inside as RCRA waste)

WEEK OF NOV 21-26, 2005 (Thanksgiving week)

1. Pumped chrome solution into three totes for off site disposal
2. Sold scrap steel to outside dealer
3. Sold Nickel balls, nickel scrap to RRD Services ()
4. Lots of cleanup, inside, and in ww treatment area.

WEEK OF NOV 28-DEC 3, 2005

1. Received further totes to pump out the rest of the chrome solution.
2. Pumping of remaining chrome solution completed on Tuesday, November 29.
3. Pump and combine remaining nickel solutions
4. Started, and made great progress in removing boiler pipes, including insulated wrap. Ladder and roof work
5. LA Chemical returned to pick up two acid storage tanks, and caustic soda storage tank.
6. Sold plating racks (for copper) to a scrap dealer for \$2000.
7. Two tanks removed from line.
8. Continuing sweep and clean up.

WEEK OF DEC 5-8, 2005

1. Scraped and power washed tanks from cleaner line, strip line(15 tanks)
2. Swept, shoveled up residue from under/ next to tanks that were removed.
3. Dec 6: Sold #2 grade copper and 4500 gal/hr filter to Highland Plating
4. Dec 6: Sold #1 copper, 222 lbs, #2 copper, 2042 lbs, and clean lead. 1905 lbs
To EKCO Metals

Week of December 5-8, 2005 cont.

5. [REDACTED], County Sanitation, came by to look. No problems noted
6. South Coast AQMD came by for annual inspection. Inspector did not know we were shut down. We showed him our shut down operations, plus the amp hour logs. No problems noted.
7. Sold scrap steel to [REDACTED] (boiler pipe, angle iron, misc.)
8. General sweeping and cleaning.

WEEK OF DEC 12-16, 2005

1. More power washing
2. More cleaning tanks
3. More general cleanup, outside and in
4. Major cleanup outside, all closure items now inside.
5. Discovered security breach in fenced yard that houses Hazardous Waste. This yard is shared with a neighbor, who is missing some items. Holes in the fence to be repaired or blocked.
6. Dec 15: Sold some titanium baskets, and copper to Highland Plating

WEEK OF DEC 19-23, 2005

1. More work on cleaning tanks, power washing
2. Dec 22: Sold more copper bars to EKCO Metals. Also sold some SS, and unclean lead.
3. Seeking appropriate vendor to safely and economically dispose of tanks
4. Work stalled until cleaned tanks can be moved off site

WEEK OF DEC 27-30, 2005

1. People looking at boiler
2. More work finding a vendor to dispose of tanks
3. December 29: Six tanks loaded and sent to Pomona Scrap Metals Inc. as scrap steel.
4. December 30: Two more tanks loaded and sent to Pomona Scrap as scrap steel

WEEK OF JAN 3-6, 2006

1. [REDACTED] SFS Fire Department, came by in response to a phone call last week asking for clarification on how clean tanks need to be for shipment as scrap steel. Discussed requirements and suggestions with [REDACTED]
2. Further triple wash of tanks, preparing for shipment offsite
3. Jan 4: Nottingham finally came to pick up 5 supersacks of F006 waste for shipment to World Resources in Arizona for recycling. See Manifest 24485375

WEEK OF JAN 9-13, 2006

1. Jan 9, 2005 RRD Environmental Services picked up 6 totes of chrome solution treatment and disposal in Texas. Transporter: Northstate Environmental. [REDACTED] accidentally took some of our paperwork. Mailed back by later in the week. See Manifest 3386531
2. [REDACTED] consultant, came by to discuss work plan for below ground testing. His quote is under discussion by Foss Plating

Week of January 9-13, 2006 cont.

3. Agreement reached on vendor to remove and recycle scrap steel from tanks, etc. Major work this week recleaning tanks to meet vendor requirements.
2. Scrap steel to be placed inside tanks.
3. Clean up started in chrome plating area.
4. Continued training on separation of various wastes – plating waste with nickel, plating waste with chrome, scrap steel, scrap electrical, and RCRA waste, content to be determined.
5. Easy Translator finally working. Made and posted a number of in-house labels.

WEEK OF JAN 16-20, 2006

1. Jan 16: First roll-off for scrap steel, mostly tanks, arrived. To be filled daily and exchanged.
2. Jan 20: Received first payment from Adams Steel for the scrap steel, \$467.86
3. Continued cleaning of tanks
4. Cleanup of floor in chrome plating area.
5. More (Wednesday and Friday) training (one on one) separation of nickel bearing and chrome bearing plating waste.
6. Swept around roll-off. Mostly rusty dust. Put in "to be identified" bin.
7. More cleanup in nickel plating area
8. [REDACTED] started emptying the clarifier pits, pumping sludge to sludge settler.
9. Began cleaning out trenches.

WEEK OF JAN 23-27, 2006

1. Continued activity cleaning tanks and sale as scrap metal
2. Updated the Security Plan to reflect closure activity. Numerous updated signs were posted: Prop 65, Wastewater Treatment Area, and Hazardous Waste Storage Area. in both Spanish and English.
3. Jan 26; Adams Steel picked up the last of the scrap steel for now. Two tanks left inside, five outside.
4. Swept entire outside loading area. Dust from scrap steel put in RCRA waste drum.
5. FOIA ex 6, Personal Privacy [REDACTED] started dismantling the strip area super structure. Girders to be cut up and sold as scrap steel.
6. [REDACTED] continues working on emptying clarifier pits and processing sludge

WEEK OF JAN 30-FEB 3, 2006

1. More work on dismantling both super structures. The last of the hoists were removed by Friday. Steel set aside for sale as scrap.
2. The hoists themselves may have little value, except as scrap metal. However, the motors may be sellable.
3. Cross bars in strip area all removed. Started work on cross bars in chrome area.
4. Continued work on processing sludge. Some fluids started into clarifier, but most settling tanks are empty.

WEEK OF FEB 6-10, 2006

1. Continued work on dismantling both super structures.
2. Continued work on processing sludge.

Week of February 6-10, 2006 cont.

3. [REDACTED] pulled a sample of rinsate from power wash of equipment. Called Western Analytical to pick up sample. Called/faxed [REDACTED] at County Sanitation for clarification of how many tests she wants done.
4. Continued sweep and clean.

WEEK OF FEB 13-17, 2006

1. Spoke with [REDACTED] from County Sanitation and received go-ahead to treat rinsate from power wash of equipment. She is only requiring a test of wastewater after treatment and before discharge. Our area and our project has been turned over to the supervision of [REDACTED] of LA County Sanitation.
2. Great progress on dismantling superstructures. First roll off to take scrap steel from this phase of cleanup arrived Wednesday, Feb 15.
3. First roll off (scrap steel) picked up either late Feb 16, or early Feb 17.
4. Second roll off (scrap steel) almost full and ready for pickup.

WEEK OF FEB 20-24, 2006

1. Finished dismantling super structure! Only two uprights still in. These need a jack hammer to bring it down.
2. Second roll off picked up, and third filled. Third roll off pickup Thursday, Feb 23
3. Crew began final sweep in plating line area.
4. More work removing electrical wiring, other pipes.
5. Began treating wastewater from power washing operations.
6. Beginning arrangements to ship, by manifest, app 15 bags of filtercake and nickel bearing waste for recycling.

WEEK OF FEB 27-MARCH 3, 2006

1. Further work removing electrical wiring and other pipes and equipment.
2. Officially engaged [REDACTED] as our consultant for the ground testing phase of closure. Sent letter to [REDACTED] at DTSC.
3. More work treating wastewater from power washing operations.
4. March 2, 2006: [REDACTED], LA County Sanitation, came by and took a sample from the bottom of the collection pit. We knew by looking that we were out of compliance. Our first guess of the cause was that unwashed out of service equipment was setting just above the collection pit, and rain the previous early Tuesday has washed contaminants into the empty pit. Equipment was moved and the area swept.
It's a good thing because it rained the following day.

WEEK OF MARCH 6-10, 2006

1. Date for ground testing set for Monday, March 13, 2006. [REDACTED] received the go-ahead from [REDACTED] DTSC.
2. Tuesday: March 7. [REDACTED] began power washing the walls in the nickel area.
3. Rog out to see and prepare to bring roll-off bin for RCRA waste.
4. Removed more used equipment near collection pit. Swept area.
5. Further cleanup and power wash all week. Pumped all pits and trenches by Friday

WEEK OF MARCH 13-17, 2006

1. Monday, March 13. Ground testing day, including soil vapor and mobile lab for analysis of possible VOCs. Initial results, VOCs at level or 3-5
2. FOIA ex 6, Personal Privacy [REDACTED], Santa Fe Springs Fire Department, came by to inspect mid morning.
3. Pickup of nickel bearing waste delayed – more approvals needed from DTSC
4. Waiting until ground testing complete to bring in roll-off. Several vendors to give quotes.
5. Reswept area around the collection pit
6. Friday: We have an unfortunate disgruntled employee situation. Our long time wastewater treatment operator decided it is time to quit. He says he thought it was OK to release the wastewater being held, since, as far as he could see the wastewater was clean. We discharged some treated wastewater, up to 600 galleons, content unknown, but probably within limits. More wastewater from power-wash is still on site, and more will be generated.

WEEK OF MARCH 20-24, 2006

1. More cleanup. Swept the upper horseshoe.
2. New inventory of the various hazardous waste from cleanup in powder or dried sludge form. Found 15 bags of nickel bearing waste, 6 bags of RCRA waste, and 2 bags of polishing dust.
3. March 22: Shipment of 2 bags of polishing dust to US Ecology, located in Beaty Nevada, by manifest 25195226.
4. Employee Training: review of all policies for closure. Included new polishers for Foss Metal Finishing. Stressed NO polishing dust is to go in the regular trash. Set up a fresh satellite storage drum.
5. Training emphasized that no wastewater goes down the sewer until tested and approved.
6. Started final preparation to ship six bags of plating waste, RCRA, to US Ecology. Shipment scheduled for sometime next week.

WEEK OF MARCH 27-31, 2006

1. Finished preparation of shipment of six bags of plating waste with metals.
2. March 28: Shipment of 6 bags of RCRA waste to US Ecology, Manifest #25195238
3. Started clear out of chemical storage building. Continued sorting misc RCRA waste to go into a roll off.
4. [REDACTED] moved most of the used equipment and RCRA waste that was stored in the warehouse across the street. Foss Plating is vacating the building.
5. [REDACTED] worked on cleanup of the rest of the strip line. Nice job.
6. FOIA ex 6, Personal Privacy [REDACTED] discussed removing the rest of the berms in the strip area. Work scheduled for sometime next week.

WEEK OF APRIL 3-7, 2006

1. Partial removal of remaining berms by [REDACTED]

WEEK OF APRIL 10-14, 2006

1. More work on berms, with cleanup
2. Problem area – guck at bottom of old strip tank.
3. Arrival of roll-off for misc RCRA solids – cement, pvp piping, floor boards, etc.
4. April 11, 2007. FOIA ex 6, [REDACTED], LA County Sanitation, brought the expected NOV for March 2, 2006. By this time we had recognized that the problem may have been caused by an employee who either did not understand, or disobeyed directions and discharged some contaminated fluids. This employee no longer works for Foss Plating.

WEEK OF APRIL 17-21, 2006

1. April 18: Roll-off sent by manifest, Starlight, to US Ecology in Beatty, NV
See Manifest 25148338
2. Second roll-off arrived, and loading begun.
3. County San reinspection. Due to causes of NOV, recommended that we block the outtake pipe.
4. Expandable plug purchased 4/20, installed 4/21/06.

WEEK OF APRIL 24-28, 2006

1. April 25: Second roll-off sent by manifest, Starlight, to US Ecology in Beatty, NV
See Manifest 25148346
2. April 27: Rented a jack hammer to remove guck at bottom of old strip tank
3. [REDACTED], from Starlight, came by to sample waste with nickel in supersacks.
4. [REDACTED] swept up and collected dirt, cement, etc. from strip area, placed in supersacks and 55 gal drums for hazard determination.
5. Phase II Assessment of Subsurface completed April 28, 2006 by Winefield. This report is to be submitted to DTSC

WEEK OF MAY 1-5, 2006

1. Arrival of another roll-off for further shipment of scrap steel.
1. [REDACTED], Starlight, back again to look over the nickel. Pickup promised for this week, or asap.
2. [REDACTED] noticed accumulated dried guck on side of strip tank, and suggested that it should be carefully scrapped off since it had a pH of 14.
3. FOIA ex 7, Enforcement [REDACTED] did an excellent job of scraping the inside of the strip tank, before loading it into the roll-off. Guck put in supersacks for later disposal.

WEEK OF MAY 7-12, 2006

1. Sold titanium baskets.
2. More scrap steel sold.
3. FOIA ex 6, Personal Privacy [REDACTED], CUPA, came by to check progress. He looked over recent manifests and received a copy of the Phase 11 Investigation (ground testing)
4. Overseas shipping container arrived Thursday, May 11 for nickel waste.
5. Picked up after hours on Friday, May 12

WEEK OF MAY 15-19, 2006

1. Upon arrival Monday morning, noted that the shipping container had been picked up. No paperwork was found. I called Starlight, and [REDACTED] promised to send our copy of the manifest, and other paper work.
2. Bundled and took newspapers for recycling at Puente Hills Recycle Center for a small payment. They were willing to also accept four boxes of outdated business papers without payment. Plans to take more business paper waste next week.
3. Nickel bearing waste returned on Thursday, May 18, 2006 by Starlight, due to a disagreement between [REDACTED] (salesman) and Starlight Environment. [REDACTED] said the nickel would be picked up Friday by Miles Chemical.
4. Addendum to Report on Findings completed on May 19, 2006 by Winefield. This Report is to be submitted to DTSC.

WEEK OF MAY 22- 26, 2006

1. Received second NOV from LA County Sanitation from a sample taken April 11, 2006. First NOV from March 2. Disgruntled employee left March 17. Further inspection and sample taken April 11, with first suggestion to block the out take pipe. We wish we had thought of it earlier. (Hindsight is always 20/20)
A home made block was installed during the week of April 11-17. On April 20 the inspector returned and gave better information for an "official" expandable plug. The plug was purchased on April 20, and installed on April 21.
Probable cause of the violation. Our current system is a gravity flow. We think the last tank overflowed, in spite of the fact that many of the upstream treatment tanks were empty. Whatever was in the final tank was obviously out of compliance. The plug has solved that problem.
The collection pit has been dry. Rainwater/possible leaks from system, were pumped back on May
Holes were drilled on the bolt and wing nut on May 30, 2006
Phoned the inspector.

WEEK OF MAY 30-JUNE 2, 2006

1. Miles Chemical delivered shipping boxes, heat treated pallets for nickel bearing waste.
2. [REDACTED] worked on transferring waste from supersacks to shipping boxes. Box was nailed to the pallet, and a plastic liner went inside the box.
3. [REDACTED] finished by placing metal shipping bands around the boxes. We ended up with a total of 16 boxes.
4. Pickup of nickel bearing boxes expected Thursday or Friday. Rescheduled for Monday or Tuesday of next week.
5. Put improved labels on further RCRA waste. Was careful to transfer the correct date for the start of collection.

WEEK OF JUNE 5-9, 2006

1. Several phone calls to Miles Chemical concerning pick up of nickel bearing waste. Latest promise is Friday. They are being very careful with the paper work.

2. FOIA ex 6, Personal Privacy PR, CPP and FOIA ex 6, Personal Privacy REA, met with DTSC regarding the latest ground testing. FOIA ex 6, Personal Privacy will rewrite parts of the
3. ground analysis to meet DTSC requirements. We will meet again after DTSC reviews the findings. At the time, FOIA ex 6, Personal Privacy had questions regarding the chart showing chrome content in the nickel area.
4. Prepared samples for analysis of 4 five gallon containers with concentrated metal bearing waste. Took to Phibro-Tech for analysis on Friday.
5. Rechecked the pH in the treatment tanks. One tank has a very high pH of 12. FOIA ex 6, Personal Privacy to adjust on Friday. Oops, the mixer is broken. FOIA ex 6, Personal Privacy will try to fix.

WEEK OF JUNE 12-16, 2006

1. FOIA ex 6, Personal Privacy finished putting further RCRA waste, as a powder or dirt, in the left over shipping boxes for disposal. Boxes were labeled.
2. More labels were put on other waste.
3. Phone call on Monday from FOIA ex 6, Personal Privacy. He is contacting Miles Chemical again to firm up when pick up of nickel bearing waste can be expected.

WEEK OF JUNE 19-23, 2006

1. Phone contact with FOIA ex 6, Personal Privacy. Enthone, will pick up nickel on Thursday or Friday.
2. Monday-Tuesday, clean up in archive storage (business records) Throw aways from 1997, 1998 were set aside to take for recycling.
3. Wednesday. We took a car load of business papers from 1997-1998 to the new County Sanitation Recycling Center by Puente Hills Land Fill. This time it was refused because it is a business waste. So, it had to go in the dumpster.
4. Contacted FOIA ex 6, Personal Privacy, geologist from Winfield, Associates, regarding questions on Subsurface Investigation of our ground. During the meeting with DTSC I had questioned the chart (3) showing chrome content in the nickel area. FOIA ex 6, Personal Privacy admitted there was an error, and said it was corrected. We should get a copy of the revised report late this week or sometime next week.
5. Another phone contact from FOIA ex 6, Personal Privacy. Pickup now will be done by Ecology Control. FOIA ex 6, Personal Privacy will e-mail exact time and date. Contact with FOIA ex 6, Personal Privacy confirmed scheduled pickup to be Tuesday or Wednesday of next week.
6. Sold polishing machinery to Foss Metal Finishing. They will make payments.

WEEK OF JULY 3-14, 2006

1. Inspection by FOIA ex 6, Personal Privacy on July 6. We have lots to do. New list submitted to FOIA ex 6, Personal Privacy.
2. Contact with FOIA ex 6, Personal Privacy to help wastewater treatment. A workable plan was established.
3. Met with Santa Fe Springs, FOIA ex 6, Personal Privacy to discuss progress, and clarify city requirements on Monday, July 10, 2006
4. Sent out start of mass mailing to metal finishers to sell remaining equipment
5. FINALLY! 16 bags of nickel bearing waste picked up on Wednesday, July 12 By Ecology Control, Manifest 98375474
6. Addendum #3 submitted to DTSC on July 13, 2006 by Winefield

WEEK OF JULY 17-21, 2006

1. Progress selling equipment
2. Further contact with PhibroTech concerning pickup of liquid nickel waste
3. Received a phone call from [FOIA ex 6, Personal Privacy]. The Nickel Waste is on the train to go back east.
4. Contacted RRD Environmental to get pick up of 6 containers of RCRA Waste Manifest and labels arrived.
5. Received a copy, by mail, of Addendum #3 to FPA-06-028 Report. Both [] and [] read and Oked.
6. Started further work on clean up inside the building. Organized items on the floor.
7. Sold Time Saver

WEEK OF JULY 13-28, 2006

1. Monday – more work on cleanup inside.
3. Tuesday – RRD picked up 3 boxes and 4 super sacks of RCRA waste for disposal at Beaty, NV, Manifest 25195435
4. Tuesday – Roll off delivered for more scrap steel
- 5.

WEEK OF JULY 31-AUG 4, 2006

1. Work on cleanup of shop floor, more power wash of floor
2. Loaded scrap steel into roll off
3. Addendum #4 and comments submitted to DTSC by Winefield. Finally approved.

WEEK OF AUG 7- 11, 2006

1. Roll off bin with scrap steel picked up Tuesday morning, Aug 8
2. Good sweep of loading area, parking lot in front of WW Treatment area.
3. [FOIA ex 6, Personal Privacy] CUPA, came by and discussed progress with []
4. Phone conference with [FOIA ex 6, Personal Privacy] PE. He will complete paperwork For DTSC, including a response to the July e-mail from [FOIA ex 6, Personal Privacy] Work to Be completed by Friday when [] leaves for vacation.
5. Continued power wash of floor and walls.
6. Started cleanup of downstairs office

WEEK OF AUG 14-18, 2006

1. Swept both forklift pathways. Swept debris near dumpster from office and inside cleanup
2. More work cleaning up inside
3. Aug 16. [] attended MFASC training for new Manifest requirements.
4. Began work on updating the Contingency Plan
5. Wrote new inspection checklist more appropriate for clean up activity. The old one provided by the city was no longer good enough.
6. Letter from DTSC, dated August 4, 2006 approved sampling locations for outside testing locations. Attach;emtn #3 – Boring locations submitted Aug 11 by Winefield.

WEEK OF AUG 21-25, 2006

1. Now that [REDACTED] has more time (from Foss Metal Finishing) he began sorting the rest of the shop equipment and supply, and throwing away junk. Did a good job separating "OK to trash" from possible RCRA waste.
2. Completed update of Contingency Plan, both the Short Form and the Long Form. Short Form submitted to City of Santa Fe Springs. Both forms can be found in the Gray Notebook in the office.
3. Updated the wallet size phone number list, and gave a card to everyone for everyone's wallet. Printed the Mini Contingency Plan in both Spanish and English

WEEK OF AUG 27 TO SEPT 1, 2006

1. [REDACTED] tested the wastewater in all the clarifier tanks. Most are ok for discharge.
1. Meeting with [REDACTED] FOIA ex 6, Personal Privacy to go over procedure to complete treatment of wastewater in clarifier
2. More cleanup inside the shop.

WEEK OF SEPT 11-15, 2006

1. [REDACTED] met with [REDACTED] to further direct him to pump out some of the clarifier tanks to above ground tanks for treatment. Pumping done Thursday
2. Met several times with Gibraltar concerning switching consultants. Gibraltar went down to DTSC and discussed options to move this along with [REDACTED] FOIA ex 6, Personal Privacy
3. [REDACTED] spoke over the phone with [REDACTED] FOIA ex 6, Personal Privacy. Meeting with [REDACTED] set for 9:00 Monday morning to go over the details.
4. [REDACTED] attended update training for Hazardous Waste Handling. Further training for [REDACTED] to follow.
5. [REDACTED] FOIA ex 6, Personal Privacy, LA County Sanitation, came by to check the collection pit. It is very dry. Unfortunately, [REDACTED] wasn't here to go over our current plans.

WEEK OF SEPT 18-22, 2006

1. Meeting Monday with [REDACTED] FOIA ex 6, Personal Privacy, City of Santa Fe Springs. Attending were [REDACTED] FOIA ex 6, Personal Privacy, along with [REDACTED] FOIA ex 6, Personal Privacy from Gibraltar. According to [REDACTED], all belowground work must be under DTSC. This new approach won't work.
2. We provided a copy of the Phase 2 to [REDACTED] FOIA ex 6, Personal Privacy. They will look over and see if they can still help us.
3. [REDACTED] FOIA ex 6, Personal Privacy are working on wastewater treatment, under the direction of [REDACTED]
4. A box arrived for more scrap steel. [REDACTED] is working on filling it.

WEEK OF SEPT 25-30, 2006

1. [REDACTED] FOIA ex 6, Personal Privacy are continuing to work on further wastewater treatment so we can empty the clarifier.
2. Contacted LA County Sanitation regarding the quarterly surcharge payments. [REDACTED] FOIA ex 6, Personal Privacy checked our files. Since we have shut down, and have no discharge, we do not have to submit quarterly payments. She thought our sewer charges will be moved to our property tax statement
3. [REDACTED] FOIA ex 6, Personal Privacy LA County Sanitation, came by to inspect. No changes.
4. Wastewater treated in #3 chamber of clarifier now at pH 9-10, and nickel has successfully fallen out. However, on a very rough paper test, this wastewater is a 3 for hex chrome, and is now yellow.

5. [REDACTED] started jar tests to attempt to treat out the chrome.

WEEK OF OCT 2-6, 2006

1. [REDACTED] continues jar tests for chrome in wastewater. Nothing positive yet. [REDACTED] came by, and instructed to change the pH. It didn't work
2. [REDACTED] started another cleanup, sweep and power wash of plating floor.

WEEK OF OCT 2-6, 2006

3. FOIA ex 6, Personal Privacy [REDACTED] Gibraltar, met with FOIA ex 6, Personal Privacy [REDACTED] They agreed To come back Thursday to demonstrate how to safely acid wash some of the metal residue still on the shop floor.
4. [REDACTED] found and purchased safety equipment and pool acid.
5. Acid wash started Thursday.
6. Heavy acid smell still felt on Friday morning. [REDACTED] instructed [REDACTED] to neutralize with a little bit of sodium hydroxide.
7. [REDACTED] to get a small bit of sodium bisulfide for further jar tests on stubborn chrome in wastewater.

WEEK OF OCT 9-13, 2006

1. Monday and Tuesday we continued with the acid wash, power wash of floor in nickel area
2. Phibro Tech picked up some nickel solution on Tuesday. Manifest 000090494 JJK
3. Final power wash of floor on Wednesday.
4. [REDACTED] (Santa Fe Springs) and [REDACTED] came, by appointment, on Thursday morning. The City plans to give us a Fire Department Closure, when all hazardous chemicals, including wastewater, and other RCRA waste, are shipped off site. [REDACTED] will give us an outline of just what DTSC will require. We will need an engineer to fill in the details, and to certify how deep we can safely excavate.
5. FOIA ex 6, Personal Privacy [REDACTED] working on final wastewater treatment, using sample sodium bisulfate.
6. Started filling a roll off with more scrap steel.

WEEK OF OCT 16-20, 2006

1. Sodium Bisulfate order arrived. [REDACTED] began further treatment of two tanks with chrome.
2. Treatment worked great in above ground tank, but not in 1st chamber of clarifier.
3. Tried adding more Sodium Bisulfate on Friday.
4. [REDACTED] swept all trenches. Put dirt in supersack for RCRA disposal.
5. [REDACTED] to contact Phibro Tech regarding further nickel bearing waste, currently stored in the nickel pit. Nickel content around 400 ppm.
6. More work adding scrap steel to roll off bin.

WEEK OF OCT 23-27, 2006

1. Sodium Bisulfate further addition on Friday worked. Wastewater much clearer in 1st chamber. Nickel content is still too high. Further jar tests using floc.
2. FOIA ex 6, Personal Privacy [REDACTED] worked on repair of wall next to the men's room.
3. [REDACTED] started using a jack hammer to remove above grade cement in plating area.

WEEK OF OCT 20-NOV 3, 2006

1. [REDACTED] completed removal of above grade cement in plating area. He swept up lots of Cement powder.
2. Adams Steel could not pick up their bin because scrap steel was sticking out at the top. [REDACTED] repacked the bin.
3. A simple list of DTSC requirements was received and reviewed. Several potential contractors were contacted and interviewed. We are wait for bids. Cost is becoming quite an issue.

WEEK OF NOV 6-10, 2006

1. Further contact with potential contractors to meet DTSC requirements.
(Gibralter, FOIA ex 6, Personal Privacy [REDACTED])
2. Dissatisfaction with Winefield continues to grow.
2. Tuesday inspection of wastewater – Floc finally worked in chamber #2!
3. Further work with wastewater. Sludge settler emptied. Treatment of excess fluids from filter press to start next week.
4. [REDACTED] and crew painted the inside Friday.
5. [REDACTED] recommends that all cement be sent to Beatty, AZ as a RCRA waste. At the most, only one pallet or so is clean enough for other disposal. That wouldn't even pay for the testing.
6. Scrap steel bin picked up.

WEEK OF NOV 13-17, 2006

1. Began painting the inside walls of the building.
2. Paint residue got into wastewater in tank #2. To try more floc to clarify.
4. Sold more scrap steel for recycling.

NOVEMBER 20-30, 2006

1. More cleanup inside the building, and painting inside walls.

DECEMBER, 2006

1. Chose Astech Environmental to formulate next round of Plans for DTSC.
Plans to be submitted sometime in January.
2. More cleanup inside the building
3. More wastewater treatment
4. More painting.

JANUARY, 2007

1. More of the above.
2. Sampling & Analysis Plan submitted to DTSC, dated January 29, 2007, by astech
3. Sold more used equipment.
4. Started clean up of conduit, etc from the ceiling
5. Sent sample of treated wastewater to Western Analytical for analysis to be submitted to LA County Sanitation
6. On Jan 29 we sold the poly tanks to Tool & Jig Plating

FEBRUARY, 2007

1. February 1, 2007 shipped by Manifest 000425847 2 supersacks of hazardous waste to US Ecology in Beatly, NV.
2. Finally. Sent inquiry letter to [FOIA ex 6, Personal], LA County Sanitation regarding final discharge of accumulated wastewater, with our lab results.
3. More cleanup of conduit on ceiling, until February 13, when [REDACTED] fell at home and broke his arm
4. [FOIA ex 6, Personal], LA County San, phoned and came by to affirm technique for collecting sample – an equivalent amount from each tank
5. Sold more used equipment to Thelin.

MARCH, 2007

1. March 1, 2007 Phibro Tech picked up 300 gallons of liquid nickel bearing waste, Manifest 002697356
2. Revised Sampling & Analysis Plan submitted to DTSC on March 5, 2007, by Astech
3. While clearing scrap steel from the roof, and blower, discovered some old polishing dust. Later in the month the dust was taken down from the roof, collected and kept for disposal by manifest.
4. March 10, Adams Steel picked up their roll off, sale of scrap steel.
5. March 13, legal discharge of accumulated treated wastewater to POTW. 24-hour sampler from both LA County Sanitation and Western
4. Sold more equipment
5. Cal Tron Plating finally removed the boiler they purchased.

APRIL, 2007

1. [REDACTED] back from injury, and continued work clearing junk from the ceiling.
2. Painted beams, and support pipe.
3. Started painting the outside of building
4. More polishing dust removed from roof and set aside for disposal.

MAY, 2007

1. Finished painting the outside of the building
2. May 21, 2007 shipped 2 more bags of hazardous waste, polishing dust, to Beaty NV, using Manifest 000425993

JUNE, 2007

1. Completed painting, fix up of Men's Room #1, Ladies Room.
2. Started work on painting, fix up the downstairs office., upstairs offices
3. June 14, 2007 FINALLY!
[FOIA ex 6, Personal Privacy] Astech Environmental, started sampling the concrete using a field portable X-Ray Fluorescence (XRF) detector. [FOIA ex 6, Personal Privacy] DTSC, was here and marked the specific spots for testing. [FOIA ex 6, Personal Privacy] City of Santa Fe Springs also came by to inspect progress. Results inconclusive. [REDACTED] will return next Thursday, June 21.
4. June 21, 2007. [FOIA ex 6, Personal Privacy] came back to continue concrete sampling, plus the core ground samples, as detailed in the work plan, and using exact sample spots as set by [FOIA ex 6, Personal Privacy] DTSC.
4. Not all cement core samples were acceptable. [FOIA ex 6, Personal Privacy] returned June 29 to pull a few more samples. Some lab results to be reviewed next week

JULY, 2007

1. FOIA ex 6, Personal Privacy in and out with various aspects of the current testing. Many phone conversations between FOIA ex 6, Personal Privacy.
2. Inspection by FOIA ex 6, Personal Privacy SFS Fire Department. As soon as the last of the liquid waste is removed, he wants us to get rid of all the above ground tanks, etc outside. He will return to reinspect in mid August.
3. July 17, 2007 Phibro Tech picked up app. 1500 gal of wastewater. This is the last of the liquid waste. Manifest 002695835
4. Work continued of paint/fix up of offices downstairs and upstairs.
5. More testing for VOCs inside.

AUGUST, 2007

1. Thursday August 2, FOIA ex 6, Personal Privacy back to drill for ground tests below the clarifier pits. He was assisted by FOIA ex 6, Personal Privacy. Test samples taken at 2,5 and 10 feet for metals and/or VOCs. We also tested in the abandoned Degreaser pit and in the burned area next to the sludge settler.
2. Sandblast: We experimented removing the worst of the scale on sides of clarifier pits. Further testing will determine if this is sufficient.
3. Monday, Aug 13, 2007. Meeting at DTSC with FOIA ex 6, Personal Privacy. No, we do not think we will try sandblasting the gunk off the side of the clarifier tanks. Probably Foss Plating will take out lots of contaminated concrete inside, and ship as RCRA waste. Probably Foss Plating will look for ways to "abandon in place" the cement walls and bottom of the below ground clarifier pits. We are still waiting for lab results from testing, including QC by FOIA ex 6, Personal Privacy.
4. Wednesday, Thursday, Aug 15 & 16. Foss Plating was contacted by and visited by FOIA ex 6, Personal Privacy, Santa Fe springs Fire Department regarding progress on cleanup of equipment outside. Cleanup activity started on Monday, Aug 13, by FOIA ex 6, Personal Privacy. A roll off for scrap steel arrived early in the week.
5. FOIA ex 6, Personal Privacy has a few "nibbles" on selling some of the outside equipment.
6. Tried renting a jack hammer to remove the outside berm. It was too slow.
7. Monday Aug 20, FOIA ex 6, Personal Privacy brought his large back hoe, which successfully brought down the 4' berm.
8. Sent one roll-off with steel for recycling, including one of the outside tanks.
9. Thursday, Aug 23. FOIA ex 6, Personal Privacy took a truck load of scrap brass, copper and titanium to ECKO Metals for recycling. Sold for \$122.75
10. Friday, Aug 24, swept outside where more scrap steel is waiting for pickup. Found lots of misc. trash, sand, sand & gravel, and just plain dirt. Left some discoloration from the sand.

SEPTEMBER, 2007

1. Adams Steel began payments for scrap steel sold.

9/4	\$300.00
9/10	\$553.75
9/11	\$ 84.68
9/19	\$400.00

Items scrapped included tanks, the sludge settler, slant plate clarifier
2. Sold the filter press to California Technical Plating
3. Received the Additional Site Assessment Report from the latest round of testing by Astech Environmental Services. Report is dated Sept 13, 2007.

4. From June 21, 2007 to Aug 2, 2007 Astech advanced a total of 23 exploratory borings, installed multiple depth soil vapor sample probes at seven locations, and collected 22 concrete core samples. Sites targeted in this investigation included the former strip line, waste nickel storage pit, degreaser vault and former plating line #2. And the clarifier area.
5. Public Notice Letters are under preparation, with a plan to mail to neighbors in early October.

OCTOBER, 2007

1. Further testing and starting on underground cleanup is stalled.
2. Further clean up of the building, painting, etc.

NOVEMBER, 2007

1. Still stalled.
2. Received letter from EPA, Region 9 asking for information regarding potential liability in the Omega Superfund Site. Letter and requirements very confusing. Began work on response.

DECEMBER, 2007

1. Interim Soil Remedy Workplan submitted Dec 19, 2007 by FOIA ex 6, Personal Privacy
2. Began work on clean up and inside painting of SDL Building.
3. Received extension from EPA on response to Omega Superfund Site. Since we are still confused over requirements, we sought the advice of our lawyer, FOIA ex 6, Personal Privacy. Response completed December 19, 2007

JANUARY, 2008

1. FOIA ex 6, Personal Privacy DTSC, gave verbal approval for In-Situ treatment below ground. Reported that we need a permit from the Water Board. Work began on permit requirements.
2. Continued work on SDL building.

FEBRUARY, 2008

1. In February, a phone conversation with FOIA ex 6, Personal Privacy revealed that official approval on this approach has been denied by her supervisor. Stopped work on Water Board permit.
2. Continued work on SDL Building, including new flooring and plumbing.
3. Began work on plan to complete the removal of the below ground clarifier pits located outside.

MARCH, 2008

1. Replaced the fence in front of wastewater treatment and clarifier areas.
2. Replaced the overhead door in the SDL Building
3. Filled in opening between the SDL building and the main building, in preparation to finding a lease tenant for the SDL building.
4. Spring Cleaning: major trimming on landscape trees and plants.

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